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5 Attorney for Defendant *LV Petroleum, LLC.*

7 **IN THE UNITED STATES DISTRICT COURT**  
 8 **FOR THE DISTRICT OF NEVADA**

10 PATRICK EMMERSON, an individual,

CASE NO. 2:25-cv-00961-MDC

11 Plaintiff,

12 **JOINT STATUS REPORT**  
 13 **REGARDING REMOVAL**

vs.

14 LV PETROLEUM, LLC, a Nevada  
 15 limited liability company,

16 Defendant.

17 Plaintiff Patrick Emmerson (“Plaintiff”) and Defendant *LV Petroleum, LLC*,  
 18 (“Defendant”), by and through their respective undersigned counsel, provide the following  
 19 information in response to the Court’s June 2, 2025, Minute Order. [ECF No. 4].

20 1. On May 5, 2025, Plaintiff filed this civil action against Defendant in the  
 21 Eighth Judicial District Court of Nevada, Clark County, styled *Patrick Emmerson v LV*  
*Petroleum, LLC*, Case No. A-25-918303-C. (the “State Court Action”).

22 2. On May 14, 2025, Defendant waived service of the Summons and  
 23 Complaint, which made the Defendant’s responsive pleading due on July 14, 2025.

24 3. On May 30, 2025, Defendant filed its Notice of Removal in this Court to  
 25 remove the State Court Action to this Court based on federal question jurisdiction. [ECF  
 26 No. 1]. Plaintiff does not agree that removal was proper on this basis and filed a motion to  
 27

1 remand. [ECF No.13].

2       4. Removal occurred less than 30 days after Defendant waived service. There  
3 is currently one named Plaintiff and one named Defendant.

4       5. Defendant's responsive pleading was filed on June 9, 2025 [ECF No.11].

5       6. There is a pending Motion to Remand this matter to the Eighth Judicial  
6 District Court of Nevada requiring the Court's attention. [ECF No. 13]. Defendant intends  
7 to file a response to the pending Motion to Remand on or before July 11, 2025, as directed  
8 by the Court.

9  
10 Dated: July 2, 2025.

11  
12 **GREENBERG GROSS, LLP**

13  
14 /s/ Michael A. Burnette  
15 Michael A. Burnette  
16 Attorney for Plaintiff

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18 **GORDON REES SCULLY**  
**MANSUKHANI, LLP**

19  
20 /s/ Lori N. Brown  
21 Lori N. Brown  
22 Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2025, and pursuant to Fed. R. Civ. Pro. 5, I served a true  
and correct copy of the foregoing document via CM/ECF and email to the following:

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Attorneys for Plaintiff

*/s/ Jessica C. Gerblick* \_\_\_\_\_

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